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March 16, 2016

To: Springfield Ethics Committee  
From: Office of Corporation Counsel  
Re: SPI-OIG 2015-001

The following is a summary of the information related to IG case no. SPI-OIG 2015-001:

Complaint: A complaint dated January 15, 2015 was made to Hillard/Heintz questioning whether a company that received Tax Increment Financing Funds pursuant to a redevelopment agreement with the City might have used TIF dollars to make campaign donations to a state legislative political race.

Action: Hillard/Heintz reviewed information from the City consisting of the documentation submitted by the redeveloper relating to disbursements of TIF funds for eligible project expenses. A substantial number of documents were reviewed by Hillard/Heintz. These documents included reimbursement requests by the redeveloper with attached invoices and canceled checks. Hillard/Heintz reviewed five separate reimbursement requests with attached documentation. Hillard/Heintz stated that both invoices and checks were attached to each reimbursement request showing payments to various contractors doing the work of the TIF project. On February 4, 2015, Hillard/Heintz concluded that: "[i]n all cases the city reimbursements matched the invoices provided and the payments made by the 'redeveloper'".

A further review was made by the City of documentation submitted by the redeveloper to support the TIF reimbursement requests. The documentation submitted by the redeveloper to the City matches the reimbursements made. This is consistent with the initial review by Hillard/Heintz.

Recommendation: No referral is necessary.